

REMARKS

By this Amendment, Applicants have canceled claims 65 and 66 without prejudice or disclaimer, amended claims 60, 101, and 110-113, and added new claims 119-121. No new matter has been added. Claims 60-64 and 67-121 are present in the application. Of those claims, claims 93-96 have been withdrawn from consideration as being directed to non-elected subject matter. Office Action at 7. Thus, claims 60-64, 67-92, and 97-121 remain present and pending on the merits in the present application.

As an initial matter, Applicants note that although dependent claims 113, 116, and 117 have been rejected under 35 U.S.C. § 112, second paragraph, the Office Action does not include any rejections of claims 113, 116, and 117 under either 35 U.S.C. § 102 or § 103. However, the Office Action does not expressly indicate that those claims recite allowable subject matter and that they would be allowable if the rejection under § 112, second paragraph, were overcome and those claims were rewritten in independent form. Therefore, Applicants respectfully request that the Examiner confirm that those claims would be allowable if the rejection under § 112, second paragraph, were overcome, and those claims were rewritten in independent form.

I. Claim Rejection under 35 U.S.C. § 112, Second Paragraph

Claims 60-92 and 97-118 were rejected under 35 U.S.C. § 112, second paragraph. Office Action at 2. In particular, claim 60 was rejected based on an assertion that "the claimed relationship between the geometric module and the elongate

ridge is unclear.” Id. By this Amendment, Applicants have amended independent claim 60, such that it recites, in pertinent part, “wherein the first geometric module comprises: an elongated ridge,” and thus, Applicants respectfully submit that claim 60 complies with 35 U.S.C. § 112, second paragraph.

Claim 105 was rejected under § 112, second paragraph, based on an assertion that “there is no antecedent basis for ‘the second circumferential row’” recited in claim 105. Id. Applicants have amended claim 101, the claim from which claim 105 depends, to depend from claim 98 rather than claim 97, and thus, Applicants respectfully submit that claim 105 complies with 35 U.S.C. § 112, second paragraph.

Claims 110 and 111 were rejected under § 112, second paragraph, based on an assertion that those claims “ambiguously refer to ‘the third substantially transverse grooves’ and it is uncertain if another first circumferential portion is being claimed.” Id. Applicants appreciate the Examiner’s suggested amendments to claims 110 and 111, and Applicants have amended those claims as suggested. Thus, Applicants respectfully submit that claims 110 and 111 comply with 35 U.S.C. § 112, second paragraph.

Claim 112 was rejected under § 112, second paragraph, based on an assertion that “there is no antecedent basis for ‘the second shoulder blocks’” recited in claim 112. Id. Applicants have amended claim 112 such that it recites, in pertinent part, “the third shoulder blocks.” Claim 113 has been amended in a manner consistent with the amendment to claim 112. Thus, Applicants respectfully submit that claims 112 and 113 comply with 35 U.S.C. § 112, second paragraph.

For at least the above-outlined reasons, Applicants respectfully submit that claims 60-64, 67-92, and 97-120 comply with 35 U.S.C. § 112, second paragraph. Therefore, Applicants respectfully request reconsideration and withdrawal of the claim rejection under 35 U.S.C. § 112, second paragraph.

II. Claim Rejections under 35 U.S.C. § 102

A. Claim Rejection under § 102 based on EP '758

Claims 60, 63, 64, 67, 68, 70-73, 82-85, and 92 were rejected under 35 U.S.C. § 102(b) based on European Patent Application No. EP 0 739 758 A1 ("EP '758"). Office Action at 3. Claim 60 is the only independent claim included in that claim rejection, and Applicants have amended independent claim 60. Applicants respectfully submit that amended independent claim 60 is patentably distinguishable from EP '758 because that reference fails to disclose all of the subject matter recited in amended independent claim 60.

Applicants' amended independent claim 60 is directed to a tyre for a vehicle wheel, including, *inter alia*, "an elongated ridge . . . divided into a plurality of intermediate blocks . . . , wherein each intermediate block defines a substantially trapezoidal shape" Applicants respectfully submit that EP '758 does not disclose at least this subject matter recited in independent claim 60. Indeed, Applicants note that this subject matter was previously recited in claim 66, which was not included in the claim rejection under § 102(b) based on EP '758.

For at least the above-outlined reasons, Applicants respectfully submit that EP '758 fails to disclose all of the subject matter recited in independent claim 60.

Therefore, Applicants respectfully request reconsideration and withdrawal of the claim rejection under 35 U.S.C. § 102(b) based on EP '758.

B. Claim Rejection under § 102(b) based on JP '207

Claims 60-65, 67-69, 70, 73, 74, and 92 were rejected under 35 U.S.C. § 102(b) based on Japanese Patent No. JP 6-135207 ("JP '207"). Office Action at 3. Amended independent claim 60 is the only independent claim included in that claim rejection. Applicants' respectfully submit that amended independent claim 60 is patentably distinguishable from JP '207 for reasons at least similar to those outlined above with respect to the § 102(b) rejection of claim 60 based on EP '758. For example, JP '207 fails to disclose a tyre for a vehicle wheel, including, *inter alia*, "an elongated ridge . . . divided into a plurality of intermediate blocks . . . , wherein each intermediate block defines a substantially trapezoidal shape" Applicants respectfully note that this subject matter was previously recited in claim 66, which was not included in the claim rejection under § 102(b) based on JP '207.

Thus, for at least the above-outlined reasons, Applicants respectfully submit that JP '207 fails to disclose all of the subject matter recited in independent claim 60. Therefore, Applicants respectfully request reconsideration and withdrawal of the claim rejection under 35 U.S.C. § 102(b) based on JP '207.

C. Claim Rejection under § 102(b) based on Fukunaga

Claims 60-64, 66-69, 70, 73, 74, 82, 83, 92, 97, and 98 were rejected under 35 U.S.C. § 102(b) based on U.S. Patent No. 6,607,018 to Fukunaga et al.

("Fukunaga"). Office Action at 3. Amended independent claim 60 is the only independent claim included in that claim rejection, and Applicants respectfully submit that amended independent claim 60 is patentably distinguishable from Fukunaga because that reference fails to disclose all of the subject matter recited in amended independent claim 60.

Applicants' amended independent claim 60 is directed to a tyre for a vehicle wheel, including, *inter alia*, "an elongated ridge; and at least two shoulder blocks; . . . wherein at least one circumferential shoulder groove separates the elongated ridge from the at least two shoulder blocks" Applicants respectfully submit that Fukunaga does not disclose at least this subject matter recited in independent claim 60. Indeed, Applicants note that this subject matter was previously recited in claim 65, which was not included in the claim rejection under § 102(b) based on Fukunaga.

For at least the above-outlined reasons, Applicants respectfully submit that Fukunaga fails to disclose all of the subject matter recited in independent claim 60. Therefore, Applicants respectfully request reconsideration and withdrawal of the claim rejection under 35 U.S.C. § 102(b) based on Fukunaga.

III. Claim Rejections under 35 U.S.C. § 103

The following claim rejections under 35 U.S.C. § 103(a) were included in the Office Action:

1. Claims 75-81 were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with U.S. Patent No. 5,725,700 to Ichiki ("Ichiki") and U.S. Patent No. 6,311,748 to Boiocchi et al. ("Boiocchi") (Office Action at 4);

2. Claim 91 was rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Ichiki, Boiocchi, and U.S. Patent No. 5,660,651 to Diensthuber ("Diensthuber '651") (*id.*);
3. Claims 84-90 were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Diensthuber '651 (*id.* at 5);
4. Claims 99-106, 109-111, 114, and 115 were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with U.S. Patent No. 6,619,352 to Diensthuber et al. ("Diensthuber '352") "and/or" Japanese Patent No. JP 56-131406 ("JP '406") (*id.*);
5. Claims 107 and 108 were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Diensthuber '352 "and/or" JP '406, and Japanese Patent No. JP 06-135207 ("JP '207") (*id.* at 6); and
6. Claims 112 and 118 were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Diensthuber '352 "and/or" JP '406, and European Pat. App. No. EP 0 114 594 ("EP '594") (*id.*).

Each of the claims rejected under 35 U.S.C. § 103(a) depends from independent claim 60. Thus, those dependent claims are patentably distinguishable from Fukunaga for at least the reasons outlined above with respect to the § 102(b) rejection based on Fukunaga. Further, Ichiki, Boiocchi, Diensthuber '651, Diensthuber '352, JP '406, JP '207, and EP '594 fail to overcome the deficiencies of the rejection under § 102(b) based on Fukunaga. Therefore, dependent claims 75-81, 84-91, 99-112, 114, 115, and 118 should be allowable, and Applicants respectfully request reconsideration and withdrawal of the claim rejections under 35 U.S.C. § 103(a).

IV. New Independent Claims 119-121

By this Amendment, Applicants have added new independent claims 119-121. No new matter has been added. Independent claim 119 recites subject matter similar to the subject matter recited in claims 60,¹ 97, and 99. Independent claim 120 recites subject matter similar to the subject matter recited in claims 60 and 97, along with subject matter related to the exemplary subject matter disclosed at page 24, lines 6-23, of the specification. Independent claim 121 recites subject matter similar to the subject matter recited in claims 60 and 73-76, along with subject matter related to the exemplary subject matter disclosed at page 10, lines 11-17, of the specification. Applicants respectfully submit that new independent claims 119-121 are patentably distinguishable from the references of record in the present application.

A. New Independent Claim 119

As outlined above, new independent claim 119 recites subject matter similar to the subject matter recited in claims 60, 97, and 99. Claims 97 and 99 depend from independent claim 60, with claim 99 depending from claim 97. In the Office Action, claim 99 was rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Diensthuber '352 "and/or" JP '406. Office Action at 5. To the extent that the Examiner considers rejecting new independent claim 119 under 35 U.S.C. § 103(a) based on Fukunaga in combination with Diensthuber '352 "and/or" JP '406, Applicants respectfully

¹ References to claim 60 with respect to new claims 119-121 relate to the form of claim 60 prior to some of the amendments to claim 60 included herein.

submit that such a rejection would be improper because independent claim 119 is not *prima facie* obvious based on those references for at least the reasons explained in more detail below.

The rejection statement in support of the § 103(a) rejection relating to claim 99 asserts that "it would have been obvious . . . to form the right side of Fukunaga et al's tread (which has circumferential grooves separating a shoulder block row, first inner block row and second inner block row) with the claimed fourth grooves (fifth grooves and sixth grooves)," purportedly based on:

Diensthuber et al's suggestion to form the side of an asymmetric tread having blocks defined by circumferential grooves and transverse grooves such that the transverse grooves ("fourth grooves") separating blocks of a row of an 'inner row' are offset relative to shoulder grooves ("third grooves"), it being taken as well known / conventional per se in the tread art that circumferentially offsetting transverse grooves in one row relative to another row reduces noise;

"and/or", based on

Japan 406's suggestion to provide block rows of a tread separated by circumferential grooves with inclined transverse grooves which are alternately inclined at angles θ_1 (70-110 degrees) and θ_2 (60 degrees or less) to thereby form trapezoidal blocks and enhance slip resistance for a wet road (abstract, figures).

Office Action at 5-6. Applicants respectfully disagree with the rejection statement's obviousness assertions at least because Fukunaga teaches away from the rejection statement's hypothetical modification to its disclosed tread.

Under 35 U.S.C. § 103(a), several basic factual inquiries must be made in order to evaluate whether a claim is obvious. According to the M.P.E.P., obviousness is a question of law based on these factual inquiries. § 2141(II) (citing KSR Int'l Co. v.

Teleflex Inc., 127 S. Ct. 1727, 82 U.S.P.Q.2d (BNA) 1385 (2007), and relying on the framework established by Graham v. John Deere Co., 383 U.S. 1, 17, 148 U.S.P.Q. (BNA) 459, 467 (1966)). In particular, the Graham factual inquiries create a four-part framework for evaluating whether a claim is obvious. Graham, 383 U.S. at 17. Those factual inquiries are as follows:

- (A) Determine the scope and contents of the prior art;
- (B) Ascertain the differences between the prior art and the claims at issue;
- (C) Resolve the level of ordinary skill in the pertinent art; and
- (D) Evaluate evidence of secondary considerations.

Id. The M.P.E.P. advises that the question of obviousness must be resolved on the basis of these factual determinations. § 2141(I).

The M.P.E.P. also provides guidelines for making these factual determinations. For example, the M.P.E.P. cautions that in order to avoid impermissible hindsight reasoning, these factual determinations must be made with respect to "the time the invention was made." § 2141.01(III). Moreover, the M.P.E.P. cautions that when "determining the differences between the prior art and the claims, the question [of obviousness] is not whether the differences themselves would have been obvious, but [rather, it is] whether the claimed invention as a whole would have been obvious." § 2141.02(I). Indeed, when considering the prior art, [a] prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention." Id. § 2143.03(VI) (second emphasis added).

Once the Graham factual inquiries have been resolved, it must be determined whether a claim is *prima facie* obvious. § 2141(III). Following the guidance of the

above-outlined framework, the M.P.E.P. advises that in order to establish a *prima facie* case of obviousness, "the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made." § 2142. Further, "the examiner must then make a determination whether the claimed invention 'as a whole' would have been obvious at that time to that person," but "[k]nowledge of applicant's disclosure must be put aside in reaching this determination" because "impermissible hindsight must be avoided and a legal conclusion must be reached on the basis of the facts gleaned from the prior art"; not on the basis of applicant's disclosure. Id.

In view of this guidance, the M.P.E.P. further advises that "[i]f a proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious." § 2143.01(VI). In other words, if the prior art teaches away from a proposed modification, then the prior art does not render a claim *prima facie* obvious.

Applicants respectfully submit that Fukunaga teaches away from the rejection statement's hypothetical modification to the Fukunaga tread. Therefore, regardless of what Diensthuber '352 and JP '406 disclose, it would not have been *prima facie* obvious to modify the Fukunaga tread in the hypothetical manner proposed in the rejection statement.

Fukunaga discloses a tread for improving wet condition drainage ability. (See, e.g., col. 3, ll. 19-22). Fukunaga discloses that this is achieved by virtue of the tread shown in Fig. 1 of Fukunaga. In particular, the tread shown in Fig. 1 includes on an

inboard side 12R, continuous lateral main grooves 22 that extend from a central circumferential main groove 14 to a ground contact edge 27R. (Col. 5, ll. 21-33). The angle that each lateral groove 22 forms with respect to the tire circumferential direction gradually increases, within a range of 55° to 90°. (Col. 5, ll. 38-42). On an outboard side 12L, lateral main grooves 24 extend between the central circumferential main groove 14 to a ground contact edge 27L. (Col., ll. 23-41). The angle that each lateral main groove 24 forms with respect to the tire circumferential direction gradually increases, within a range of 55° to 90°. (Col. 6, ll. 42-45). Fukunaga further discloses that this combination of lateral grooves 22 and main lateral grooves 24, by virtue of extending between central circumferential main groove 14 and respective inboard and outboard ground contact edges 27R and 27L, at the prescribed 55° to 90°-gradually increasing angle, results in "water [being] drained from the central circumferential main groove 14 to the tire axial direction outer side very effectively." (Col. 3, ll. 19-22; col. 4, ll. 15-18). Further, Fukunaga cautions that "[i]f the angle of the inboard lateral grooves 22 with the tire circumferential direction is outside the range 55° to 90°, water in the vicinity of the ground contact center cannot be drained very effectively." (Col. 10, ll. 4-7).

Thus, Fukunaga discloses that the continuous nature and the gradually increasing angle with respect to the circumferential main groove 14 of the inboard lateral grooves 22 and the outboard lateral grooves 24 is critical to achieving and expressly disclosed object of Fukunaga's tread, namely, "wet condition drainage ability" (col. 1, l. 34). Applicants respectfully submit that if for the sake of argument, Fukunaga's tread were modified in the hypothetical manner proposed in the rejection

statement, it would defeat this expressly disclosed object. In particular, if the inboard lateral grooves 22 were modified such that they formed grooves that were "circumferentially offset," as recited in independent claim 119, they would be discontinuous. By virtue of being discontinuous, they would stray from the express teachings of Fukunaga, which suggests that the gradually increasing angle of the lateral grooves 22 with respect to the central circumferential main groove 14 is critical to achieving Fukunaga's desired wet condition drainage ability. Indeed, if the inboard lateral grooves 22 were modified such that they formed grooves that were circumferentially offset, Fukunaga's inboard land portions 26 would effectively block the inboard lateral grooves 22, thereby hindering Fukunaga tread's wet condition drainage ability. For at least this reason, one of ordinary skill in the art would have understood that Fukunaga teaches away from the rejection statement's proposed, hypothetical modification to the inboard lateral grooves 22, which are critical to achieving Fukunaga's objective to provide a tread having improved wet condition drainage capability.

For at least the above-outlined reasons, Applicants respectfully submit new independent claim 119 is not *prima facie* obvious based on Fukunaga, Diensthuber '352, and JP '406, regardless of whether they are viewed individually or as a whole. Therefore, Applicants respectfully submit that new independent claim 119 is patentably distinguishable from the references of record in the present application.

B. New Independent Claim 120

Applicants' new independent claim 120 is directed to a tyre for a vehicle wheel, including, *inter alia*,

a tread band . . . , wherein the tyre is configured to be mounted on the vehicle wheel such that a first opposing side edge of the tread band corresponds to an inner portion of the tyre, and a second opposing side edge of the tread band corresponds to an outer portion of the tyre, . . .

wherein the tread band comprises a tread band pattern . . . compris[ing]: a first circumferential portion corresponding to the inner portion of the tyre and a second circumferential portion corresponding to the outer portion of the tyre,

the first circumferential portion comprising a first geometric module, wherein the first geometric module comprises: an elongated ridge; and at least two shoulder blocks; . . .

wherein the elongated ridge is bounded by two grooves oblique to [a] circumferential extension direction [of the tyre], . . . and

wherein the second circumferential portion comprises a second geometric module, wherein the second geometric module comprises: a plurality of third shoulder blocks; and a plurality of inner blocks; . . .

wherein the third shoulder blocks are bounded by third grooves oriented substantially transversely to the circumferential extension direction, . . . and

wherein the inner blocks are bounded by fourth grooves oriented substantially transversely to the circumferential extension direction.

Applicants respectfully submit that the prior art of record in the present application does not disclose or render *prima facie* obvious at least this subject matter recited in new independent claim 120.

For example, the Fukunaga tread is disclosed as having an *outboard* side area 12L, including outboard side slanted longitudinal main grooves 20 crossed by outboard side lateral main grooves 24, and an *inboard* side area 12R, including first and second inboard side circumferential grooves 16 and 18 crossed by inboard side lateral main grooves 22. (See Fig. 1). Thus, even if for the sake of argument, Fukunaga's

outboard side slanted longitudinal main grooves 20 were to hypothetically correspond to "the two grooves oblique with respect to the circumferential extension direction" recited in independent claim 120, Fukunaga's outboard side slanted longitudinal main grooves 20 are located on the *outboard* side of Fukunaga's tread. In contrast, Applicants' independent claim 120 recites that "the two grooves oblique with respect to the circumferential extension direction" that bound the elongated ridge of the first geometric module, are located on the first circumferential portion of the tyre, which corresponds to the *inner portion* of the tyre, instead of the *outer portion* of the tyre. For at least this reason, Fukunaga does not disclose all of the subject matter recited in new independent claim 120.

For at least the above-outlined reasons, Applicants respectfully submit that new independent claim 120 is neither anticipated nor rendered *prima facie* obvious based on the prior art of record in the present application. Therefore, Applicants respectfully submit that new independent claim 120 is patentably distinguishable from the references of record in the present application.

C. New Independent Claim 121

Applicants' new independent claim 121 recites subject matter similar to the subject matter recited in claims 60 and 73-76, along with subject matter related to the exemplary subject matter disclosed at page 10, lines 11-17, of the specification. In the Office Action, claims 75 and 76, among others, were rejected under 35 U.S.C. § 103(a) based on Fukunaga in combination with Ichiki and Boiochhi. Office Action at 4. The rejection statement asserts that it would have been obvious to modify the tire tread of

Fukunaga in view of Ichiki and Boiochhi "to provide Fukunaga et al's asymmetric tire tread with the claimed auxiliary block" Id.

Applicants respectfully submit that the hypothetical combination of Fukunaga, Ichiki, and Boiochhi fails to disclose all of the subject matter recited in independent claim 121. For example, the combination fails to disclose

an elongated ridge;
an end block;
an auxiliary block; and
at least two shoulder blocks

...

wherein the end block defines an axially external end of [an] elongated ridge, substantially in axial alignment with one of said at least two shoulder blocks; [and]

wherein the auxiliary block is disposed circumferentially close to the end block, substantially in axial alignment with another of said at least two shoulder blocks,

as recited in independent claim 121. Fukunaga fails to teach shoulder blocks that have the recited relationship to the end block and the auxiliary block. The rejection statement identifies Fukunaga's land portions 28 as corresponding to the recited shoulder blocks and implicitly concedes that Fukunaga's tire tread does not include the recited auxiliary block. Office Action at 3. Ichiki fails to disclose an end block and an auxiliary block having the recited relationship to shoulder blocks. Rather, Ichiki discloses shoulder blocks, each associated with two separate obliquely extending groups of blocks. Thus, Ichiki fails to disclose a geometric module including a single elongated ridge associated with two shoulder blocks. Thus, if for the sake of argument, Ichiki were to hypothetically disclose an elongated ridge, Ichiki discloses two such elongated ridges for each

shoulder block rather than one elongated ridge for every (at least) two shoulder blocks, as recited in independent claims 121. Boiochhi fails to disclose a geometric module including an elongated ridge in combination with an end block and an auxiliary block. Thus, the hypothetical combination of Fukunaga, Ichiki, and Boiochhi fails to collectively disclose all of the subject matter recited in independent claim 121, and further, it would not have been obvious to combine the teachings of those references in a hypothetical manner that would result in the subject matter recited in independent claim 121.

The arrangement recited in independent claim 121 may result in the exemplary end block 14, auxiliary block 15, and shoulder blocks 5 depicted in Figs. 1 and 2 of Applicants' disclosure. Thus, the elongated ridge 8, end block 14, auxiliary block 15, and shoulder blocks 5 are delimited by grooves 7, 9, 16, and 17 in an exemplary manner, such that continuous channels are provided, which enhances water drainage. Further, at least two shoulder blocks 5 are associated with elongated ridge 8, which results in at least twice as many shoulder blocks as elongated ridges. Thus, end block 14 and auxiliary block 15 provide a gradual transition from the number of intermediate blocks 10 encountered along the circumferential development of the tread to the shoulder blocks 5, wherein there are at least twice as many shoulder blocks 5 as groups of intermediate blocks 10 of each elongated ridge 8. As a result, the number of blocks in a given circumferential row of blocks is not reliant on the number of blocks in other circumferential rows of blocks, for example, the row of blocks including the shoulder blocks. Thus, as outlined in Applicants' specification at page 5, lines 1-10, for example, the number of blocks arranged in each row is not strictly conditioned by the number of blocks present in other circumferential rows, such as the shoulder rows.

For at least the above-outlined reasons, Applicants respectfully submit that new independent claim 121 is neither anticipated nor rendered *prima facie* obvious based on the prior art of record in the present application. Therefore, Applicants respectfully submit that new independent claim 121 is patentably distinguishable from the references of record in the present application.

VI. Conclusion

For at least the above-outlined reasons, independent claims 60 and 119-121 should be allowable. Further, claims 61-64, 67-92, and 97-118 depend from allowable independent claim 60. Thus, those dependent claims should be allowable for at least the same reasons as independent claim 60. Further, withdrawn claims 93-96 also depend from allowable independent claim 60, which is generic with respect to those claims. Thus, dependent claims 93-96 should be allowable for at least the same reasons as independent claim 60. Accordingly, Applicants respectfully request reconsideration of this application, withdrawal of the claim rejections, rejoinder and examination of withdrawn claims 93-96, and allowance of all of pending claims 60-64 and 67-121.

If the Examiner believes that a telephone conversation might advance prosecution of this application, the Examiner is cordially invited to call Applicants' undersigned attorney at (404) 653-6559.

Applicants respectfully submit that the Office Action contains a number of assertions regarding the claims. Regardless of whether those assertions are addressed specifically herein, Applicants respectfully decline to automatically subscribe to them.

Please grant any extensions of time required to enter this Amendment and charge any additional required fees to our Deposit Account 06-0916.

Respectfully submitted,

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